UNITED STATES DISTRICT COURT FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA :

VS. CR. No. 16 – 11 M

JASON BOUDREAU :

MOTION TO CONTINUE EMPANELMENT AND EXTEND TIME FOR FILING MOTIONS

Now comes Jason Boudreau, the Defendant in the above captioned matter, and moves this Honorable Court to continue the empanelment date and extend time for the filing of pretrial motions in this matter, for a period of 60 days. Mr. Boudreau submits the attached memorandum in support of this request.

The government, through AUSA Denise Barton, has no objection to the granting of this Motion.

Respectfully submitted Jason Boudreau By his attorney,

/s/ Olin Thompson #5684 Assistant Federal Defender 10 Weybosset St., Ste. 300 Providence, RI 02903 (401) 528-4281 FAX 528-4285 olin thompson@fd.org

CERTIFICATION

I hereby certify that a copy of this motion was delivered by electronic notification to Denise Barton and Sandra Hebert, Assistant United States Attorneys, on May 1, 2017

/s/ Olin Thompson

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF RHODE ISLAND

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VS. CR. No. 16 – 11 M

JASON BOUDREAU :

MEMORANDUM IN SUPPORT OF MOTION TO CONTINUE IMPANELMENT AND EXTEND TIME FOR FILING MOTIONS

Mr. Boudreau has moved this Honorable Court to continue the empanelment date and extend the time for filing pretrial motions for a period of 60 days. In support of this request, counsel states that that the defendant today filed a Motion to Suppress Evidence (Docket #43). The response date for this Motion is presently May 15, 2017. In addition, the defendant has notified that he is researching and intends to file a Motion to Reconsider, asking this Court to reconsider its Order (Docket #40) denying defendant's prior Motion to Suppress (Docket #30). The Government will similarly need time to respond to that Motion, and the Court will require time to decide both Motions.

The time requested is for the filing and litigation of pre-trial motions and is therefore specifically excludable under the Speedy Trial Act, 18 U.S.C. § 3161(h)(a)(D).

Respectfully submitted Jason Boudreau By his attorney,

/s/ Olin Thompson #5684 Assistant Federal Defender 10 Weybosset St., Ste. 300 Providence, RI 02903 (401) 528-4281 FAX 528-4285 olin_thompson@fd.org

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/s/ Olin Thompson